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10 *Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

11 **IN THE UNITED STATES DISTRICT COURT**

12 **FOR THE DISTRICT OF NEVADA**

13 THOMAS A. LARMORE,

14 Plaintiff,

15 v.

16 EQUIFAX INFORMATION SERVICES, LLC;
17 EXPERIAN INFORMATION SOLUTIONS,
18 INC; TRANSUNION, LLC; NAVIENT
19 SOLUTIONS, LLC D/B/A NAVIENT,

20 Defendants.

21 Case No. 2:18-CV-02349-RFB-VCF

22 **STIPULATION AND ORDER
EXTENDING DEADLINE FOR NAVIENT
SOLUTIONS, LLC TO FILE AN
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT**

23 **(FIRST REQUEST)**

24 Plaintiff THOMAS A. LARMORE ("Plaintiff") and Defendant NAVIENT SOLUTIONS,
25 LLC ("NSL"), by and through their respective counsel, stipulate and agree to extend the deadline
26 from January 3, 2019 to January 25, 2019, for NSL to File an Answer or Otherwise Respond to
27 Plaintiff's First Amended Complaint (ECF No. 4).

28 On December 11, 2018, Plaintiff filed his Complaint (ECF No. 1). On December 12, 2018,
29 Plaintiff filed his First Amended Complaint. The claims at issue necessitate additional time for
30 fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so
31 that it can meaningfully respond to the specific allegations contained in Plaintiff's First Amended
32 Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action,
33 and therefore requires additional time to investigate the allegations and claims asserted against
34 NSL; particularly because of the Holidays. Plaintiff has no opposition to NSL's request for an
35

1 extension until January 25, 2019 to file an answer or otherwise respond to Plaintiff's First
2 Amended Complaint.

3 This is the first stipulation for extension of time for NSL to respond to Plaintiff's First
4 Amended Complaint and is being made in good faith and not for purposes of undue delay. No
5 additional requests for extensions are contemplated.

6 **IT IS SO STIPULATED.**

7 Dated this 24th day of December 2018.

8 **HOLLEY, DRIGGS, WALCH, FINE,**
9 **PUZEY STEIN & THOMPSON**

10 /s/ Michael R. Ayers
11 JAMES W. PUZEY, ESQ.
12 MICHAEL R. AYERS, ESQ.
13 ANDREA GANDARA, ESQ.
14 800 S. Meadows Parkway, Suite 800
15 Reno, Nevada 89521
16 *Attorneys for Defendant*
17 *NAVIENT SOLUTIONS, LLC*

18 Dated this 24th day of December 2018.

19 **HAINES & KRIEGER, LLC**

20 /s/ David H. Krieger,
21 DAVID H. KRIEGER, ESQ.
22 8985 S. Eastern Avenue, Suite 350
23 Henderson, NV 89123
24 *Attorneys for Plaintiff*

25 **ORDER**

26 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up
27 to and including January 25, 2019 is so ORDERED AND ADJUDGED.

28 Dated this 4th day of January, 2019.

29 
30 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of December, 2018, I served a copy of the foregoing **STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT SOLUTIONS, LLC TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT** upon the party below via electronic service through the United States District Court for the District of Nevada's ECF system:

David H. Krieger, Esq.
HAINES & KLRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Attorney for Plaintiff

By: /s/ SUSAN M. MATEJKO
An Employee of Holley Driggs Walch Fine
Puzey Stein & Thompson